SOUTHERN DISTRICT	11101 000111	
MILAGROS FRANCO,		Docket No. 1:22-CV-04011
	Plaintiff,	(AS)
-against-		
380 SECOND LLC ANI GRAMERCY LLC,	O SMALL DOOR	
	Defendants.	

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law and all of the pleadings and proceedings heretofore had herein, plaintiff Milagros Franco will and herby does move this Court before the Honorable Arun Subramanian, United States District Judge, at the United States Courthouse located at 500 Pearl Street, Courtroom 15A, New York, New York 10007, on a date and time to be determined by the Court for an Order (1) granting judicial notice of plaintiff's exhibits, PX-8, PX-9, PX-10, PX-11, PX-12, PX-15 and PX-19 and (2) prohibiting defendants 380 Second LLC and Small Door Gramercy LLC, their attorneys, and any witnesses from, directly or indirectly, mentioning, referring to, interrogating, or attempting to convey to the jury in any manner any of the facts or allegations regarding Plaintiff's other lawsuit against non-parties concerning places of public accommodations not implicated in this action.

PLEASE TAKE FURTHER NOTICE that, pursuant to this Court's Order, dated July 11, 2024, responses shall be filed no later than August 2, 2024 at noon.

Dated: July 22, 2024

Respectfully submitted,

SMITH LEGAL ADVISORS LLC

By: ____/s/ Susan K. Smith, Esq Attorneys for Plaintiff 85 Delancey Street New York, New York 10013 Telephone: (920) 689-3315 sksmith@smithlegaladvisors.com

and

HANSKI PARTNERS LLC

By: ____/s/ Robert G. Hanski, Esq Adam S. Hanski, Esq. Attorneys for Plaintiff 85 Delancey Street New York, New York 10013 Telephone: (212) 248-7400 Facsimile: (212) 248-5600 rgh@disabilityrightsny.com ash@disabilityrightsny.com